

6-28

**ROPES & GRAY**  
225 FRANKLIN STREET  
BOSTON, MASSACHUSETTS 02110

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WASHINGTON, D.C. 20036  
(202) 887-5734

November 22, 1982

Charles C. Bering, Esquire  
United States Environmental  
Protection Agency  
Enforcement Division  
John F. Kennedy Federal Building  
Boston, MA 02203

U.S. v. AVX Original  
Litigation Document

Dear Charles:

I have prepared an FOIA request, a copy of which is enclosed. I have not sent it out yet because I do not want to ruffle feathers at the EPA or antagonize anyone. I am interested, however, in making certain that I have as much data as possible in connection with my representation of Aerovox. This is important not only in order to respond to EPA, but also because of the fishermen and AVX. Before formally sending this letter to the appropriate FOIA person, I would be happy to discuss it with you to see if there is some way to facilitate my obtaining the data in which I am interested.

I would also like to thank you and the other EPA officials who attended the session the other day. It was most informative.

Sincerely,

*Paul*

Paul B. Galvani

PBG:cic  
Enclosure

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Public Affairs Office  
22nd Floor  
JFK Federal Building  
Boston, MA 02203

Dear Sir:

Request is hereby made, pursuant to the Freedom of Information Act, for a copy of the entire EPA files with respect to PCB contamination in New Bedford and New Bedford Harbor, including without limitation files concerning AVX, Aerovox, Inc., and Cornell-Dubilier, and also without limitation including all data being reviewed by Metcalf and Eddy Inc. in connection with the preparation of the Remedial Action Master Plan for New Bedford. Request is also made for the EPA files with respect to the New Bedford plant of Revere Copper & Brass Co., 24 North Front Street, New Bedford. Request is also made for any such file with respect to Rodney Metals Co., also situated in New Bedford.

Since these files are undoubtedly extensive, I would appreciate an estimate of copying expenses before you undertake to copy anything for me. I would also request a list of any materials withheld by you, and a specification of the exemption relied upon.

Please do not hesitate to contact me if I can explain this request or facilitate your production.

Very truly yours,

Paul B. Galvani

PBG:cic

*P.B.  
except  
enforcement  
MEMOS  
Superfund  
Ranking notes*

*NEES files  
CL for  
Part A's*

*Suggests they  
read here*

*Not done  
the RALOR  
products  
C.A. office  
specific  
requests  
needed.*